

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF RHODE ISLAND**

In Re:
Robert Loisel
Shawna Loisel

Chapter 13
Case No. 12-10404
Honorable Diane Finkle

Debtors

RESPONSE TO OBJECTION TO CLAIM

Now comes Movant, Wells Fargo Bank, National Association on Behalf of the Certificateholders Morgan Stanley ABS Capital I Inc. Trust 2005-HW4 Mortgage pass-Through Certificates, Series 2005-HE4, by and through its attorneys, Orlans Moran PLLC and hereby responds to the Objection to Allowance of Amended Proof of Claim as follows:

1. Debtor objects to the Amended Proof of Claim on the basis that the Mortgage has been modified to an amount of \$180,000.00 pursuant to the Confirmed Chapter 13 Plan.
2. The Order confirming the Plan provides that the modification of the loan shall not be effective unless and until the Debtor completes the Chapter 13 Plan.
3. The Amended Proof of Claim relates to the status of the loan at the time of the filing of this Chapter 13 Bankruptcy. It would be improper to reflect post-petition changes to the claim, such as the modification to \$180,000.00, in an amended proof of claim.

Dated: April 15, 2016

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